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July 3, 2025

**VIA ELECTRONIC FILING**

Hon. Zahid N. Quraishi, U.S.D.J.

Clarkson S. Fisher Building & U.S. Courthouse

402 East State Street

Trenton, NJ 08608

**RE: Kim v. Hanlon, No. 24-1098**  
**Conforti v. Hanlon, No. 20-8267**

Dear Judge Quraishi:

This firm, along with Bromberg Law LLC, represents Plaintiffs in the above matters. As Your Honor is aware, the June 3, 2025 Order denying summary judgment motions/motions to dismiss ordered the remaining parties (Plaintiffs and Bergen and Union County Clerks) to file a joint status letter indicating how they plan to proceed. See Kim DE321; Conforti DE253. The parties requested an extension to file the joint status letter on July 7, 2025, which was granted. See Kim DE323; Conforti DE255. Subsequently, all parties filed motions for reconsideration. See Kim DE324, 325; Conforti DE256, 257.

Plaintiffs' counsel has spoken with counsel for the Bergen and Union County Clerks. In light of the motions for reconsideration, which remain pending and are still being briefed, all parties are in agreement that a joint status letter would be premature at this time because (1) discussions between the parties about the best way to proceed will be more productive after receiving the Court's decision on the pending motions for reconsideration; and (2) at that time, the parties will be better positioned to make fully-informed decisions about next steps in the case. Thus, all remaining parties respectfully request that the joint status letter be placed on hold until after the Court issues an opinion on the outstanding motions for reconsideration.

Respectfully submitted,

/s/ Brett M. Pugach

Brett M. Pugach, Esq.

WEISSMAN & MINTZ LLC

c. All Counsel of Record (via ECF)